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SEP 20 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of
800 Data Base Access Tariffs

)
) CC Docket No. 93-129
)

TO: The Common Carrier Bureau

U S WEST DIRECT CASE

U S WEST Communications below addresses the issues which the Bureau identified in its Designation Order, DA 93-930 (July 19, 1993).¹ For the Bureau's convenience, U S WEST has organized this direct case to follow that employed in the Designation Order.

A. Terms and Conditions

Issue 1: The degree of clarity with which the LEC 800 data base tariffs describe the services offered.

U S WEST's 800 data base tariff does not lack clarity in any way. U S WEST has previously documented that the few criticisms which were made against its tariff were either misplaced or misinformed.² Because no one has even attempted to refute this demonstration, no purpose would be served by U S WEST repeating that demonstration here.

¹U S WEST has already raised the issue regarding public disclosure of its cost model. See U S WEST Petition for Clarification or, in the Alternative, Reconsideration, CC Docket No. 93-128 (Aug. 18, 1993). Issues pertaining to this cost model will not, therefore, be discussed in this direct case.

²See U S WEST Reply to the Petitions to Reject or Suspend, Transmittal No. 335, at 17-20 (March 29, 1993)("U S WEST 800 Tariff Reply").

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Subissue: Should the LECs include RESPORG services in their 800 data base tariffs?

RESPORG services are not a communications service within the ambit of the Communications Act. However, if they are, then all common carriers subject to the Act — including interexchange carriers — must tariff their respective RESPORG services. There is no basis in the Act to treat one set of common carriers different from other common carriers.

B. 800 Data Base Query Tariffs - Price Cap Carriers

Issue 2: The reasonableness of the methods used by the price cap LECs to restructure their traffic-sensitive baskets, while adjusting for exogenous costs.

The Bureau has identified three ways in which price cap companies could restructure their traffic-sensitive baskets and calculate the exogenous change permitted by the 800 Data Base Access Order. While it used the second method (largely because of its simplicity), U S WEST does not, at least at this time, take a position with respect to any of the three methods.

For the Bureau's benefit, U S WEST appends as Exhibit A a calculation of its 800 data base costs using all three methods.

Issue 3: The reasonableness of the price cap LECs' 800 data base rates.

Subissue: Are the exogenous costs claims by the price cap LECs reasonable?

This Commission has held that price cap companies may treat as exogenous "those costs incurred specifically for the implementation of 800

data base service."³ Some have questioned whether U S WEST should be allowed to include SSP software because, they believed, such software is "broadly used for SS7-out-of-band signalling associated with existing services, as well as for many non-800 vertical services."⁴ In response, U S WEST demonstrated that these petitioners had their facts wrong because the SSP software in question was used (and will be used) solely in the provision of 800 data base service.⁵ Indeed, the Commission itself has observed that the equipment used in 800 data base service "is not service-independent."⁶

Because the SSP software U S WEST must use in providing 800 data base service cannot be used to support other services, this software necessarily was deployed specifically for the implementation of 800 data base service and necessarily is used solely in the provision of such service. As such, the costs associated with this software may be treated exogenously.

Subissue: Have the LECs used reasonable rate making methodologies in developing their basic query rates?

U S WEST used the actual number of 800 call messages that were generated over its network in 1992 in developing its demand for its 800 data base access service. Subsequent experience with 800 data base confirms

³800 Data Base Rate Restructure Order, 8 FCC Rcd 907, 911 ¶ 28 (Jan. 29, 1993).

⁴National Data Corp. Petition to Suspend, at 12.

⁵See U S WEST 800 Tariff Reply, at 12-14.

⁶Intelligent Networks, CC Docket No. 91-346, FCC No. 93-380, at 4 n.9 (Aug. 31, 1993).

that U S WEST's demand estimates were reasonable — as actual usage has been within 2% of U S WEST's estimated demand:

800 Data Base Messages
(May-July, 1993)

Estimated Demand	612,846,020
Actual Usage	598,567,877

Subissue: Have the LECs used reasonable rate making methodologies in developing their vertical feature rates?

U S WEST has two sets of so-called vertical services — POTS translation and call handling and destination ("CH&D") — which have different rates because U S WEST incurs different costs in providing them. With both services U S WEST used the methodology which the Commission has prescribed,⁷

Only the CH&D rate was controversial, with some arguing that U S WEST's rate was too low, while others contending that the rate was too high. This lack of consensus suggests that U S WEST's CH&D rate is about right. While U S WEST's rate is not the highest rate when compared to other telephone companies, neither is it the lowest rate.

⁷The ratio of price to direct cost was developed and compared to the ratio of total Part 69 expenses to the total direct cost for the total Traffic Sensitive Traffic category. A comparison of these ratios confirms that U S WEST is fully within the bounds of the Price Cap rules.

Appendix A

One preliminary comment must be made at the outset. The calculations performed in the course of compiling the data responsive to the Bureau's Appendix A resulted in a slightly higher total exogenous costs than had been filed originally — an increase of approximately 0.3%. This slight deviation becomes apparent by the product of the demand and the unit investments/costs. Computer rounding of unit investments and unit cost, when multiplied by significant demand, likewise may have contributed to this deviation.

1. If a discount rate is used in your demand calculations, explain the rationale for using this rate.

U S WEST did not use a discount rate.

2. If you based your demand growth assumptions completely on past performance, explain why the introduction of 800 data base service will have no effect on the growth rate of 800 query demand for your company.

As noted, U S WEST based its 800 data base demand using historical demand for 800 NXX service. As further noted, actual experience with 800 data base demand is approximately 2% lower than the demand U S WEST had estimated.

3. Explain how the demand assumptions were used in your ratemaking methodology.

U S WEST used the 800 access demand it filed in its 1992 annual filing to calculate its exogenous costs itemized in Exhibit A (e.g., rate base, depreciation, expenses less depreciation, taxes).

4. Provide the annual costs for all expenses related to the SMS/800 incurred pursuant to contracts with Bellcore, Data Services Management, Inc., or any other entity. Provide the terms of the contract and an explanation of how the annualized amount is calculated.

The annual costs for all U S WEST expenses related to the SMS/800 are \$1,040,000. This expense covers (a) U S WEST's access to the SMS/800 to receive 800 record downloads and to perform SCP administration/network management functions; (b) necessary software support to ensure compatibility between the SMS/800 and U S WEST's SCPs; and (c) ongoing support of the NASC and the Kansas City Data Center for maintenance and trouble resolution of U S WEST's links connecting the SMS/800 with its SCPs.

5. Provide the cost detail, by account, associated with upgrading the SSPs for 800 data base service and justify what those upgrades should be treated as exogenous costs.

Cost detail concerning U S WEST's 800/SSPs is contained in Exhibit A. However, the Bureau should be aware that U S WEST did not "upgrade [its] SSPs for 800 data base;" rather, it deployed 800/SSPs to provide 800 data base service. The reason this cost should be treated as exogenous is explained on pages 2-3 above.

6. If overhead costs were included as exogenous costs in your initial filing, justify why those costs should be treated as exogenous costs.

U S WEST did not include any overhead costs.

7. If signalling link costs between local STPs and regional STPs are included as exogenous costs, justify why those costs should be treated as exogenous costs.

U S WEST did not include any signaling link costs between its local and regional STP pairs.

8. If costs for regional or local STPs are included as exogenous costs, justify why those costs should be treated as exogenous costs.

U S WEST did not include any costs pertaining to its local or regional STP pairs.

9. For each of your company's SCPs, list and describe each service that is supported by that SCP (*i.e.*, 800 data base, LIDB, virtual private networks, wide area Centrex or unrelated administrative functions). Provide a diagram of the equipment in an SCP installation typical for your company.

U S WEST has two mated SCP pairs: one pair is devoted exclusively to 800 data base; the second pair is used to support 800 data base and LIDB (including calling party name service). A diagram of U S WEST's equipment is appended as Exhibit B.

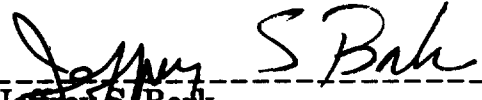
10. If costs for the SCP are allocated among the functions described above, explain your allocation procedures and provide your allocation factors and how these factors were derived.

U S WEST used its SCM/SS7 cost model and that model does not require the allocation of costs among services. U S WEST's cost model assumes that 800 data base service is provided with dedicated SCPs and that other SCP-based services such as LIDB and Calling Name Delivery are provided with SCPs which support these combined services. U S WEST's 800/SCP unit cost was derived by spreading the SCP investments over the

SCP query capacity. The SCP query capacity for serving LIDB and Calling Name Delivery is independent of the services.

Respectfully submitted,

U S WEST Communications, Inc.



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Laurie J. Bennett, Of Counsel

September 20, 1993

Attorneys for U S WEST
Communications, Inc.

EXHIBIT A

METHOD ONE		METHOD TWO		METHOD THREE	
PCI		PCI		PCI	
95.6768		95.6768		95.6768	
API		API		API	
95.3982		95.2484		95.6391	
PROPOSED SBI _h		PROPOSED SBI _h		PROPOSED SBI _h	
LOCAL TRANSPORT	90.2070	LOCAL TRANSPORT	90.2070	LOCAL TRANSPORT	90.2070
LOCAL SWITCHING	104.5012	LOCAL SWITCHING	104.5012	LOCAL SWITCHING	105.2113
INFORMATION	81.3550	INFORMATION	81.3550	INFORMATION	81.3550
800 DATA BASE	94.8403	800 DATA BASE	100.0000	800 DATA BASE *	95.6391
SBI LOWER LIMITS	SBI UPPER LIMITS	SBI LOWER LIMITS	SBI UPPER LIMITS	SBI LOWER LIMITS	SBI UPPER LIMITS
86.5090	95.6151	86.5090	95.6151	85.7865	94.8166
100.1632	110.7067	100.1632	110.7067	99.3267	109.7822
82.0312	90.6660	82.0312	90.6660	81.3461	89.9088
90.8570	100.4209	95.8000	105.8843	90.8571	100.4211
PROPOSED REVENUE		PROPOSED REVENUE		PROPOSED REVENUE	
LOCAL TRANSPORT	\$540,699,548	LOCAL TRANSPORT	\$540,699,548	LOCAL TRANSPORT	\$540,699,548
LOCAL SWITCHING	\$346,643,225	LOCAL SWITCHING	\$346,643,225	LOCAL SWITCHING	\$348,998,569
INFORMATION	\$37,687,151	INFORMATION	\$37,687,151	INFORMATION	\$37,687,151
800 DATA BASE	\$7,811,256	800 DATA BASE	\$6,346,193	800 DATA BASE	\$7,811,256
TOTAL	\$932,841,180	TOTAL	\$931,376,117	TOTAL	\$935,196,524
800 DATA BASE RATE		800 DATA BASE RATE		800 DATA BASE RATE	
\$0.004308		\$0.003500		\$0.004308	

* THE PROPOSED SBI WAS INITIALIZED AT THE API FOR THIS EXAMPLE.

JMN (800DB.XLS) 9/8/93

NOTE: THE RATES DISPLAYED ON THIS EXHIBIT ARE FOR ILLUSTRATIVE PURPOSES ONLY.

METHOD ONE	METHOD TWO	METHOD THREE
STEP ONE	STEP ONE	STEP ONE
o Restructure basket to establish the new 800 Data Base Category	o The PCI is adjusted to reflect the change in exogenous cost	o The PCI is adjusted to reflect the change in exogenous cost
STEP TWO	STEP TWO	STEP TWO
o The 800 Data Base rate is set at the level required to recover the 800 Data Base exogenous costs	o The SBI upper/lower limits for each of the original service categories are adjusted to reflect the change in PCI	o No adjustment to the existing rates, SBIs or upper/lower limits
STEP THREE	STEP THREE	STEP THREE
o All other categories in the traffic sensitive basket rates are reduced by the amount of revenue associated with the 800 Data Base service category	o The 800 Data Base category SBI is initialized at 100 with upper/lower limits set at plus/minus 5% and adjusted for the change in PCI	o The 800 Data Base category is initialized to recover the full 800 Data Base exogenous amount
STEP FOUR	STEP FOUR	STEP FOUR
o No adjustment to the SBIs to reflect the rate reductions for these existing categories	o The API is increased to reflect the additional revenue in the traffic sensitive basket attributable to including the 800 Data Base revenue	o The API is increased to reflect the increase in the traffic sensitive basket revenue due to the newly included 800 Data Base revenues
STEP FIVE		STEP FIVE
o The SBI for 800 Data Base is set equal to the current API for the traffic sensitive basket, and the upper/lower limits are set at a plus/minus 5%		o The SBI for 800 Data Base is initialized at 100 or the API for the basket
STEP SIX		STEP SIX
o The PCI is adjusted and the SBI upper/lower limits for all categories including the 800 Data Base category are increased		o The SBI upper/lower limits for the 800 Data Base category are set at the API plus and minus 5%
STEP SEVEN		
o Due to the SBI upper/lower limits raise the other rates back to their original levels and increase the SBIs and API accordingly		
STEP EIGHT		
o The resulting API has the same relationship to the new PCI as initially existed between the API and PCI		

INFORMATION REQUEST FOR 800 DATABASE SERVICE EXOGENOUS COSTS

[illegible]

STP/SCP Signalling Link

Unit Investment			0.000000	0.000000	0.000060		0.000090								0.000150
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[illegible]

Local STP/Regional STP Signalling Link

Unit Investment			0.000000	0.000000	0.000000		0.000000							0.000000
-----------------	--	--	----------	----------	----------	--	----------	--	--	--	--	--	--	----------

[illegible]

SCP/SMS Signalling Link

Unit Investment			0.000000	0.000000	0.000000		0.000000								0.000000
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[illegible]

INFORMATION REQUEST FOR 800 DATABASE SERVICE EXOGENOUS COSTS

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
	Land Acct	Build Acct	General Purpose Computers Acct 2124	Analog Switching Acct 2211	Digital Switching Acct 2212	Radio Systems Acct	Circuit Equipment Acct 2232	Other Terminal Equip Acct	Poles Acct	Aerial Cable Acct	Underground Cable Acct	Buried Cable Acct	IntraNetw Cable Acct	Bldg Wire Acct	Cond Systems Acct	Total
I. Unit Cost and Investment																
SCP																
Unit Investment			0.001643	0.000000	0.000000		0.000000									0.001643
Unit Costs																
Depreciation			0.000362													0.000362
Net Return			0.000185													0.000185
Federal Income Tax			0.000095													0.000095
State & Local Income Tax																
Maintenance			0.000000													0.000000
Administration			0.000033													0.000033
Other Tax			0.000025													0.000025
* Other Direct Expense																0.000618*
Overhead Loadings																
Total			0.000700													0.001318
Tandem Switch																
Unit Investment			0.000000	0.000000	0.005755		0.000004									0.005759
Unit Costs																
Depreciation					0.000160		0.000001									0.000161
Net Return					0.000647		0.000000									0.000647
Federal Income Tax					0.000334		0.000000									0.000334
State & Local Income Tax																
Maintenance					0.000114		0.000000									0.000114
Administration					0.000033		0.000000									0.000033
Other Tax					0.000033		0.000000									0.000033
Other Direct Expense																
Overhead Loadings																
Total					0.001321		0.000001									0.001322
SSP																
Unit Investment			0.000000	0.001827	0.001596		0.000046									0.003469
Unit Costs																
Depreciation				0.000143	0.000069		0.000006									0.000218
Net Return				0.000206	0.000180		0.000005									0.000391
Federal Income Tax				0.000106	0.000093		0.000003									0.000202
State & Local Income Tax																
Maintenance				0.000054	0.000050		0.000001									0.000105
Administration				0.000020	0.000025		0.000001									0.000046
Other Tax				0.000020	0.000017		0.000001									0.000038
Other Direct Expense																
Overhead Loadings																
Total				0.000549	0.000434		0.000017									0.001000

INFORMATION REQUEST FOR 800 DATABASE SERVICE EXOGENOUS COSTS

[illegible]

STP/SCP Signalling Link

[illegible]

Method of Assignment					DEMAND		DEMAND							DEMAND
----------------------	--	--	--	--	--------	--	--------	--	--	--	--	--	--	--------

Local STP/Regional STP Signalling Link

[illegible][illegible]

SCP/SMS Signalling Link

[illegible][illegible]

SCP

[illegible][illegible]

INFORMATION REQUEST FOR 800 DATABASE SERVICE EXOGENOUS COSTS

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P
	Land Acct	Build Acct	General Purpose Computers Acct 2124	Analog Switching Acct 2211	Digital Switching Acct 2212	Radio System Acct	Circuit Equipment Acct 2232	Other Terminal Equip Acct	Poles Acct	Aerial Cable Acct	Underground Cable Acct	Buried Cable Acct	Intra-Bldg Network Cable Acct	Aerial Wire Acct	Cond System Acct	Total
II. Jurisdictional Separations																

Tandem Switch

Total Investment																
Total Company																
Subject to Separation																
State 800 Database																
State Other																
Interstate 800 Database					12,223,756		8,496									12,232,252
Interstate Other																

Method of Assignment					DEMAND		DEMAND									DEMAND
----------------------	--	--	--	--	--------	--	--------	--	--	--	--	--	--	--	--	--------

SSP

Total Investment																
Total Company																
Subject to Separation																
State 800 Database																
State Other																
Interstate 800 Database				3,880,591	3,389,942		97,705									7,368,238
Interstate Other																

Method of Assignment					DEMAND	DEMAND	DEMAND									DEMAND
----------------------	--	--	--	--	--------	--------	--------	--	--	--	--	--	--	--	--	--------

III. Demand

A
Total

800 Database Queries

State 800 Database	
State Other	
Interstate 800 Database	2,124,023,646
Interstate Other	
Base Period Demand	
Estimated Demand	
Time Period	
Discount Rate	

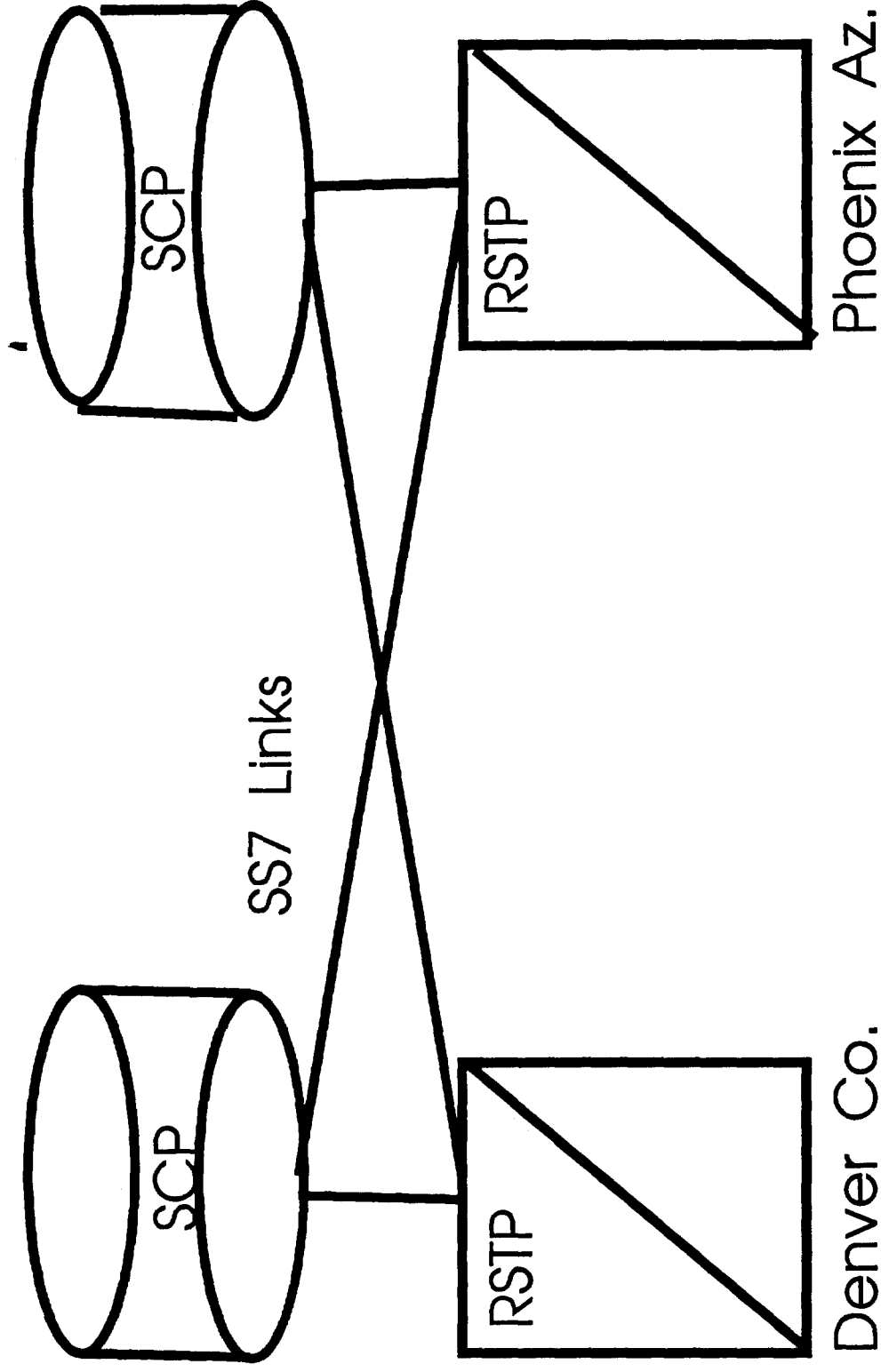
* Unit Cost and Investment – SCP, Other Direct Expense:

RTU	0.000166
CRIS/CABS	0.000065
SMS EQUIP SCP/SMS LINK	0.000003
BELLCORE BILLING	0.000384
TOTAL	0.000618

EXHIBIT B

Thornton Colorado

Tempe Arizona

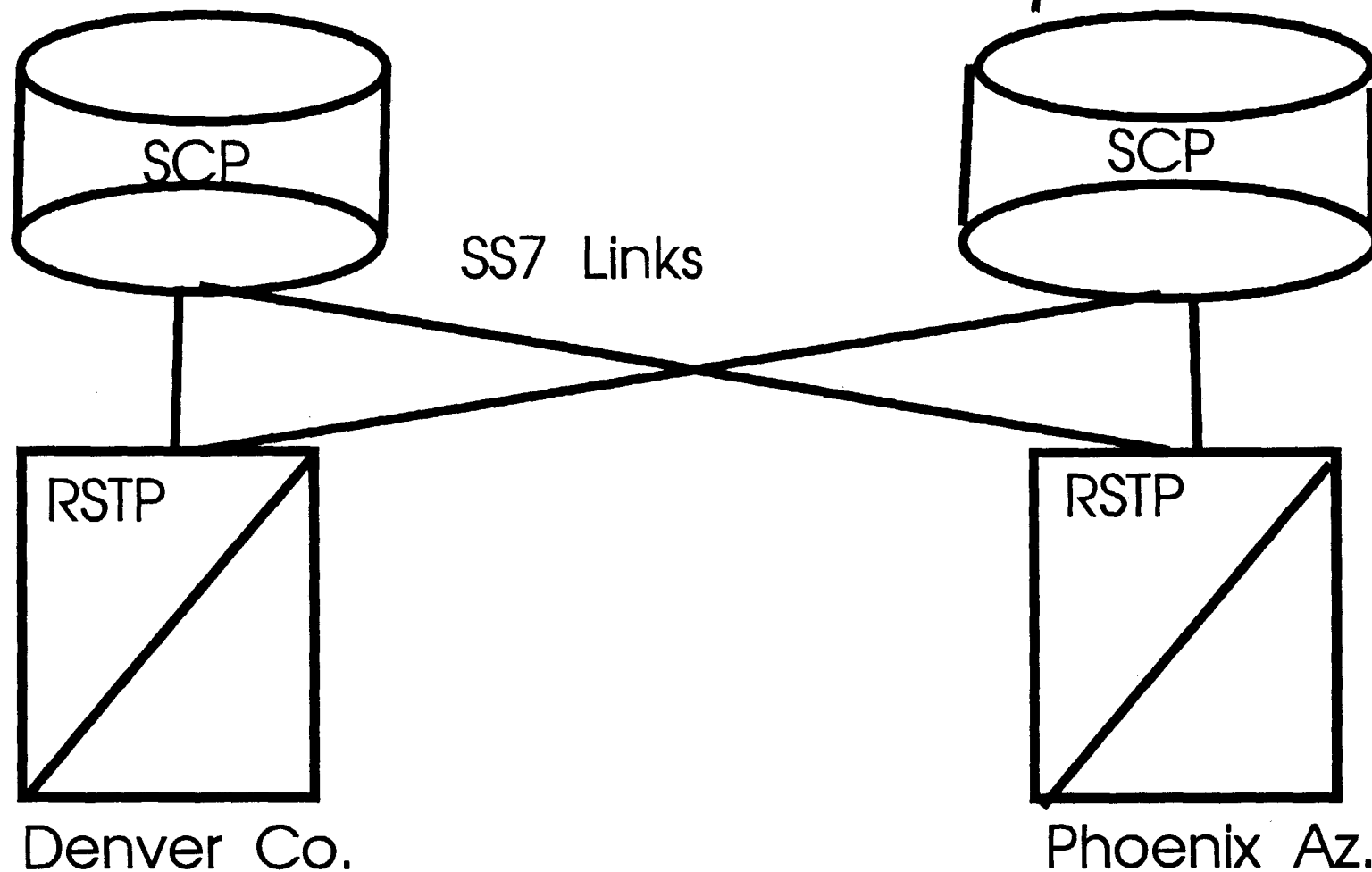


This SCP pair has 800 application software only

Pair #1

Thornton Colorado

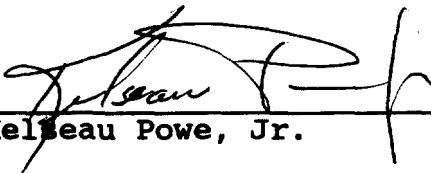
Tempe Arizona



This SCP pair has 800, LIDB and Calling Name Delivery (CNAM) application software
Pair #2

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 20th day of September, 1993, I have caused a copy of the foregoing **US WEST DIRECT CASE** to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.


Kelseau Powe, Jr.

***Via Hand-Delivery**

**** DISKETT Appendix A Spreadsheet
(CC93-129/BM/lh)**

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Century Telephone Company
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Beaux Bridge, LA 70517

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Fidelity Telephone Company
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Sullivan, MO 63080

Citizens Utilities Companies
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Hargray Telephone Company
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Hilton Head Island, SC 29938

Elkhart Telephone Company
P.O. Box 817
Elkhart, KS 67950-0817

Illinois Consolidated Telephone
Company
121 South 17th Street
Mattoon, IL 61938